

Timothy R. Volpert, OSB No. 814074
Email: tim@timvolpertlaw.com
Tim Volpert PC
610 SW Alder Street, Suite 415
Portland, Oregon 97205
Telephone: (503) 703-9054

Ethan Levi, OSB No. 994255
Email: ethan@lmhlegal.com
Jesse Merrithew, OSB No. 074564
Email: jesse@lmhlegal.com
Noah Horst, OSB No. 076089
Email: noah@lmhlegal.com
Levi Merrithew Horst PC
610 SW Alder Street, Suite 415
Portland, Oregon 97205
Telephone: (971) 229-1241
Facsimile: (971) 544-7092

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**DONNA THAMES, COLUMBIA BAR &
GRILL, INC., an Oregon corporation, dba
EXOTICA**

Plaintiffs,

vs.

**CITY OF PORTLAND, a municipal
corporation; CHARLES HALES; OREGON
LIQUOR CONTROL COMMISSION;
STEVEN MARKS; JOHN ECKHART;
DAVID LUSTER; JEFFREY BELL;
SHANNON HOFFEDITZ; DAN NCNEAL;
MIKE BOYER; MERLE LINDSEY; MARK
KRUGER; AMY ARCHER; JASON
TALLMADGE**

Defendants.

Case No.: 3:16-cv-01634-JR

**PLAINTIFF'S UNOPPOSED
MOTION TO SUBSTITUTE
PARTY**

LR 7-1 CERTIFICATION

Pursuant to LR 7-1, counsel certifies that he conferred with opposing counsel for all parties regarding this motion and no party objects to this motion.

MOTION

Plaintiff Donna Thames died intestate on June 12, 2019. On November 14, 2019, Donna Thames' father, C.L. Thames was appointed by the Washington County Circuit Court as the personal representative of his daughter's estate. *See In the matter of the estate of Donna Thames*, Washington County Court No. 19PB08829. Both of Ms. Thames' adult children expressly approved of the appointment. Therefore, plaintiff now moves the court under Fed. R. Civ. P. 25(a)(1) to substitute "C.L. Thames, as personal representative of the estate of Donna Thames" in the place of Donna Thames.

DATED this 5th day of December, 2019.

By: /s Jesse Merrithew
Jesse Merrithew, OSB No. 074564
Of Attorneys for Plaintiffs